

**REMARKS**

Claims 17-23 are currently pending, wherein claims 1-16 have been canceled, claim 17 has been amended to correct a typographical error, and claims 18-23 have been added.

At the outset, Applicants would like to thank Examiner Kazimi for the courtesy shown Applicants' Representative during the personal Interview conducted on April 15, 2009. During the Interview Applicants' Representative discussed the distinctions between the present invention and the cited prior art. Specifically, Applicants' Representative pointed out that nowhere in Mattila is there any disclosure or suggestion of converting, in the charging module, the received charge data and service code into a predefined format accepted by the Pre-Paid platform as claimed. To the contrary, the passage cited by the Examiner merely discloses that pre-paid billing model may be used and in fact the call-detail record pointed to by the Examiner is used in a postpaid scenario not a pre-paid as claimed.

In paragraph 2 of the Office action ("Action"), the Examiner rejects claims 1-14 and 16 under 35 U.S.C. 112, second paragraph as being indefinite. Claims 1-14 and 16 have been canceled rendering this rejection moot.

In paragraph 3 of the Action, the Examiner rejects claims 15 and 17 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2003/0065777 to Mattila et al. ("Mattila"). Claim 15 has been canceled rendering this rejection moot with regard thereto. Regarding claim 17, Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. § 102, the cited reference must teach and every claimed element. In the present case, claim 17 is patentable over Mattila because Mattila fails to disclose each and every claimed element. More specifically, Mattila fails to disclose sending charge data, including the service code, to a charging module; converting, in the charging module, the received charge data and service code into a predefined format accepted by the Pre-Paid platform; and sending the converted charge data to the Pre-Paid platform as claimed.

In rejecting claim 17, the Examiner points the call-detail record discussed in paragraph 0034 of Mattila as disclosing the claimed conversion of charge data. However, upon review of the cited paragraph, the Examiner will note that the call-detail record of paragraph 0034 is not

utilized in a pre-paid scenario but rather in a postpaid scenario. Accordingly, Mattila cannot possibly be interpreted as disclosing the steps of sending charge data, including the service code, to a charging module; converting, in the charging module, the received charge data and service code into a predefined format accepted by the Pre-Paid platform; and sending the converted charge data to the Pre-Paid platform. Since Mattila fails to disclose each and every claimed element, the rejection of claim 17 under 35 U.S.C. § 102 is improper. Reconsideration and withdrawal of the rejection is respectfully requested.

In paragraph 4 of the Action, the Examiner rejects claims 1-7, 10-14, and 16 under 35 U.S.C. § 103(a) as being unpatentable over Mattila, in view of U.S. Patent Application Publication No. 2004/0057442 to Westman et al. (“Westman”). Claims 1-7, 10-14 and 16 have been canceled, rendering this rejection moot.

In paragraph 5 of the Action, the Examiner rejects claims 8 and 9 under 35 U.S.C. § 103(a) as being unpatentable over Mattila and Westman, further in view of U.S. Patent No. 6,724,748 to Stille et al. (“Stille”). Claims 8 and 9 have been canceled, rendering this rejection moot.

New claims 18-23 are patentable over the cited prior art for at least the reason that the cited prior art fails to disclose or suggest a method, or computer readable medium having instructions stored thereon, for managing customer accounts in connection with a Pre-Paid platform that includes, *inter alia*, receiving, at a proxy, a request for service from a subscriber; determining, at the proxy, a service code associated with the requested service; sending charge data, including the service code, to a charging module; converting, in the charging module, the received charge data and service code into a predefined format accepted by the Pre-Paid platform; sending the converted charge data to the Pre-Paid platform; receiving an indication from the Pre-Paid platform as to whether the subscriber has an adequate balance to cover the requested service; and controlling, by the proxy, whether or nor the requested service is provided based on the received indication.

The application is in condition for allowance. Notice of same is earnestly solicited. Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Penny Caudle Reg. No. 46,607 at the telephone

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number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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